

Exhibit 161

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

MAIL TO
Deputy Director General of the
Sharia Group, may Allah bless him
No. ----

REPLY TO
SENDER
BRANCH
SECTION
TEL. NO.
DATE

Sharia Supervision Division
06/05/1421 AH (August 06,
2000 AD)

SUBJECT: His Eminence Sheikh Abd al Rahman bin Saleh al Atram, Deputy Director General of the Sharia Group, may Allah bless him
May the peace, mercy, and blessings of Allah be upon you.

This is to report the request of Brother Tawyan bin Abdullah al Tawyan, Chief Supervisor at the Sharia Supervision Division, to study English for a period of six months on a full time basis. It is well known to you that the English language is important in the various supervision operations in the company. The operations of many divisions are carried out in that language, which constitutes an obstacle to those supervisors who are not familiar with it. Therefore, it is a strategic choice for all the Division's current and future personnel.

Since Brother Tawyan enjoys the greatest seniority at the Division, one of his reasons for learning English is that he is the Chief Supervisor there. His deep study of the English language will be a great incentive for him to refine his supervision experience and expand his supervision of other divisions.

He tried to study the English language during work through courses twice before, but that study was not sufficient. I believe that learning the foreign language must be full-time, and full-time makes the learning period shorter in general, and that is less expensive for the Division and the company. I remind Your Eminence that Brother Tawyan is one of the distinguished young talents, and the effect of his learning of English will be evident on the efficiency of the Sharia supervision and the efficiency of the supervision process throughout the company.

In conclusion, I hope that Your Eminence will kindly approve assigning Brother Tawyan bin Abdullah al Tawyan to study English for a period of six months, starting from the beginning of September 2000 AD. Please note that his work has been covered for that period.

May the peace, mercy, and blessings of Allah be upon you.

Director of Sharia Supervision Division
[Handwritten Signature]
Mohamed bin Saud al Usaimi

[Handwriting: *This is approved, provided that all costs related to travel, accommodation, living, and study are at his personal expense. The company shall not be responsible for that. May Allah grant him success. 20/05/1421 AH (August 20, 2000 AD)]*

CC: Employee's file – September 29, 2000 AD

CONFIDENTIAL: This document is subject to a Protective Order regarding confidential information in 03 MDL 1570 (GBD) (SN), United States District Court for the Southern District of New York

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TRANSLATION CERTIFICATION STATEMENT

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TRANSLATOR STATEMENT

I hereby declare that, to the best of my knowledge and belief, the translation of the above referenced documents is a true, accurate and complete translation of the original.

Name of Certifying Translator: Farah Alshekhli

Qualifications: BA in Translation and Interpretation Studies, 17 years of experience, certified in Medical Terminology

Signed: *Farah Alshekhli*

Date: 07/03/2024